

SHEILA ROBINSON
306.EAST.93RD.STREET
BRONX NEW YORK 10458
PLAINTIFF ,PRO SE

VS

NAMED
DEFENDANTS ...
#1-106

RECEIVED
SDNY PRO SE OFFICE
2019 JUL 16 PM 4:12

.....
THE UNITED STATES SOUTHERN DISTRICT COURT
AMENDED COMPLAINT .#1:18-CV-12233-LLS

Information Below

*Injunction Motion For # 1:18-CV-12233-LLS
Pg -25-33*

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7-18-19

(1)

1. LARRY PAGE -CEO- GOOGLE,ADSENSE ,YOU-TUBE-1600 AMPHITHEATER PARKWAY
,MOUNTAIN VIEW CA 94043

2. SERGEY BRIN - CEO- GOOGLE ,ADSENSE ,YOU -TUBE-1600 AMPHITHEATER PARWAY
,MOUNTAIN VIEW ,CA 9403 3.

MARK ZUCKERBERG - CEO FACEBOOK- 1 HACKERWAY ,MENLO PARK,CA 94025

4. DAVID FILO - EX CEO -YAHOO- 46 PALO ALTO ,CA 94306

5. JERRY YANG - EX CEO -YAHOO- 44 LOS ALTOS HILLS ,CA 94022

6. MARISSA MAYER - EX CEO YAHOO,CHAIRMAN WALMART -165 UNIVERSITY PALO ALTO
,CALIFORNIA 94301

7. HANS VESTBERG-CEO OF VERIZON AND YAHOO- 226 WEST 45 TH STREET NEW
YORK, NY10036

8. JEFF BEZIO - CEO AMAZON.COM -1200 12 TH AVENUE SOUTH SUITE 1200,SEATTLE
,WA 98144

9. SATYA NADELLA- CEO MICROSOFT ,BING - 1 MICROSOFT WAY ,REDMOND ,WA 98052

10. BRAD SMITH - CEO MICROSOFT ,BING - 1 MICROSOFT WAY REDMOND ,WA 98052

11. GABRIEL WEINBERG - CEO GODUCKGO -20 PAOLI PIKE ,PAOLI PENNSYLVANIA 19301

12. DOGPILE - GONET- ?

13. DEVIN WENG - CEO CEO EBAY,PAYPAL-2025 HAMILTON AVENUE ,SAN JOSE ,CA
95125 14. PIERRE OMIDYAN -
CEO EBAY,PAYPAL- - 2025 HAMILTON AVENUE ,SAN JOSE,CALIFORNIA ,CA 95125

15. TIM ARM STRONG - CEO -AOL -770 BROADWAY NEW YORK ,NY 10003

16. BEN SIBERMAN -CEO - PINTEREST - 808 BRANNAN STREET SANFRICISCO ,CA
94103 17. JOEY LEVIN- CEO -
ASK, IAC - 55 WEST 18TH STREET NEW YORK ,NY 10011

18. JOAN WILSON-CEO UNION SQUARES VENTURES- 915 BROADWAY NEW YORK ,NY
10010

19. FRED WILSON - CEO UNION SQUARES VENTURES-915 BROAWAY NEW YORK ,NY
10010 20. AMY
CHESHIRE- CEO HEY GORGEOUS- 270 WEST 38TH STREET NEW YORK NY 10018

21. DAVID WECHSLER-CEO HEY GORGEOUS -270 WEST 38 TH STREET NEW YORK, NY
10018

22. JASON APFEL- CEO FRAGRANCE.NET-110 PARKWAY DRIVE SOUTH,HAUPPAUGE
NEW YORK,NY 11788

23. LLOYD PARKS - CEO GORGEOUS MAGAZINE-3250 BROADWAY APT 145 NEW
YORK,NEW YORK 10027

24. MICHAEL LOGAN - CEO GORGEOUSMAGAZINE-3250 BROADWAY APT 145 NEW
YORK,NEW YORK 10027

25. GRES MAFFEI - CEO-HSN -1 HSN STREET,PETERSBURGH ,FLORIDA 33716

26. JOHN MALONE - CEO- HSN - 1 HSN ST. PERTERSBURGH ,FLORIDA 33716

27. LES WEXNER - CEO- VICTORIA'S SECRET- THREE LIMITED PARKWAY ,COLUMBUS
,OHIO 43230

28. DAVID MCCONNELL- OF AUSTRAILAN CEO - GORGEOUS COSMETICS
8616 LA TIJERA BOULEVARD ,LOS ANGELES ,CA 90045

29. KIM KARDASHIAN WEST- 11790 SOUTH HAMPTON CT,BEL AIR ,CALIFORNIA 90077

30. KYLE KARDASHIAN -1600 WESTAR DRIVE ,OXNARD, CALIFORNIA 93033

31..DOUGLAS McMILLION - CEO WALMART-)702 WEST EIGHTH STREET BENTONVILLE
,ARKANSAS 72716 32.KANYE WEST- 11790
SOUTH HAMPTON CT,BEL AIR ,CALIFORNIA 90077

33..HELEN GIBSON - CEO- HELLO GORGEOUS-) 1829 CORDOVA ROAD -17TH STREET CAUSEWAY ,FORT LAUDERDALE , 33316
34.DOMENICO SOLE-CEO GUCCI-50 HARTE WAY SECAUCUS ,JERSEY CITY,NJ 21030
35. CHRIS DE LAPUENTE - CEO SEPHORA- 525 MARKET STREET ,FIRST MARKET TOWER FLOOR 36 ,SAN FRANCISCO ,CA 94105
36. SALLY HERSHBERGER - CEO- GET GORGEOUS-25 WEST 26TH STREET 2ND FLOOR NEW YORK ,NY 10011
37.DAVID TAYLOR - EX CEO COTY -350 5TH AVENUE ,17TH FLOOR N.Y.N.Y,10018
38.MICHELE SCANNAVINI - EX -CEO COTY - 350 5TH AVENUE ,17 TH FLOOR NEW YORK,NY 10018
39. GORGEOUS COUTURE -CEO LTD POBOX 701 SAN MATEO CALIFORNIA 94401
40. (CEO) - GORGEOUS ANTIQUES- 467 DELAWARE AVENUE ALBANY NY 12208
41.ABIDALI NEEMUCHWATA- CEO YARDLY - 3030 1114 6TH AVENUE NEW YORK ,NY
42 . MATTHEW FARRELL- CEO VITAFUSION -500 CHARLES,EWING BLVD ,EWING N.J. 08628
43. BLAKE NORSTORM- CEO NORSTORM - 1600 SEVENTH AVENUE SUITE 2600 SEATTLE, WA 98101
44. DICK COSTOLO - CEO TWITTER- 1355 MARKET STREET SAN FRANCISCO ,CA 94103
45. BOB MARINO- CEO- CAFEPRESS - 11909 SHELBYVILLE ROAD, LOUISVILLE ,KENTUCKY 40243
46.FRED DURHAM - CEO CAFE PRESS - 11909 SHELBYVILLE ROAD LOUISVILLE,KENTUCKY 40243
47. ROBERT BEAVER- CEO- ZAZZLE.COM- 1800 SEAPORT BOULEVARD REDWOOD CITY ,CA 94063 48.
KEVIN SYSTROM- CEO -INSTAGRAM 200 JEFFERSON DRIVE MENLO PARK ,CA 94025
49. CEO JARED ROWE -CEO YELLOW PAGES -247 NORTH LAKE PKWY ,GA 30084
50. BOB IGER - CEO- DISNEY -500 S. BUENA VISA STREET ,BURBANK ,CA 91521
51. PETER DOCOR -PIXAR'- 1200 PARK AVENUE EMERYVILLE ,CA 94608
52. CEO-LG ENTERPRISES- 201 JAMES RECORD RD, HUNTSVILLE ,ALABAMBA, 35824
53. VILNIUS KOLIZ - CEO VOSTOK WATCHES-VYTENIO STR22 LY-03229 VILNIUS ,LITHUANIA ; EMAIL info @votok -europe.com
54. KOLIZ VOSTOC - CEO VOSTOK EUROPE WATCHES - VYTENIO STR.22 ,LT -03229 VILNIUS ,LITHUANIA +370 52 10 6342
55. JEAN PIGOZZI - CEO -(LIMOLAND APPAREL)1 WEST 67 TH STREET STE NEW YORK ,NY 10023
56. CEO-KD WAVE- LIMO APPAREL -1 WEST 67 TH STREET STE 901 NEW YORK ,NY 10023 57.CEO -
LIMO AND LIQUOR APPAREL 1HACKER WAY MENLO PARK,CA 94025
58. CEO-ZIMZILLA - 70 BLANCHARD RD BURLINGTON ,MASSACHUSETTS 01803
59.MATT WIGHAM- CEO -BIG CARTEL.COM-362 WEST PIER POINT AVENUE ,SALT LAKE CITY , UTAH 84101
60. ERIC TURNER- CEO- BIG CARTEL.COM-362 WEST PIER POINT AVENUE ,SALT LAKE CITY ,UTAH 84101
61.BARRY NEWSTEAD - CEO RED BUBBLE/TEE PUBLIC- 111 SUTTER STREET 17TH FLOOR ,SAN FRANCISCO,CA 94104 62.
MARTIN HOSKING - CEO RED BUBBLE/ TEE PUBLIC- -111 SUTTER STREET 17TH FLOOR ,SAN FRANCISCO ,CA 94104
63.MARK ECKO-CEO -(ECKO CLOTHING TM)501 WEST 38TH STREET N.Y.,NY 10018
64. CEO- LIMO SUN - GAOSHA INDUSTRIAL COMPLEX BUILDING ,2A Z HONGCUN

STREET ,PANYU ,DISTRICT GUANGZHOU CHINA 511400
65. CEO -(GORGEOUS GIRL COSMETICS CEO)- 6776 SOTHWEST FREEWAY #530
HOUSTON TEXAS ,77036
66. PENNY PRITZER- (EX EMPLOYEE DEPT COMMERCE) 300 N. LASALLE STREET
SUITE 1500 ,CHICAGO, ILLINOISE
67. REBECCA BLANK (EX EMPLOYEE DEPT COMMERCE) -161 BASOM HALL 500
LINCOLN DRIVE MADISON ,WI 53706
68. WILBUR ROSS -(CEO/EMPLOYEE- COMMERCE DEPT) HERBERT C. HOOVER
BUILDING ,1401 CONSTITUTION AVENUE ,NW, WASHINGTON DC 20230
69.. MICHAEL BLOOMBERGE -(EX MAYOR NYC)731 LEXINGTON AVENUE ,NEW YORK,NY
10022
70.KATHLEEN SHEEHAN - (ALBANY, NY MAYOR) 24 EAGLE STREET ALBANY ,NY
12208
71.ROBERT SEARS (ALBANY NY EX POLICE CHIEF) 165 HENRY JOHNSON BLVD
ALBANY ,NY 12210
72.STEVEN KROKOFF -2006 HERITAGE WALK ,MILTON ,GA 30004 (ALBANY NY EX -
POLICE CHIEF)
73.BRENDAN COX (ALBANY NY EX POLICE CHIEF) 165 HENRY STREET ALBANY NY
12210
74. DERRICK SCHULTZ (ALBANY NY) POLICE OFFICER - 165 HENRY JOHNSON BLVD
12210
75. KURT VAN WAGENEN - CEO -TECH VALLEY-FIRST LIGHT - 41 STATE STREET
ALBANY NY 12207
76.TOM KEPPLER- (EX-LANDLORD)588 ELM AVENUE , SELKIRK ,NY 12158
77. SCOTT WAGNER-CEO -GO DADDY.COM - 14455 N. HAYDEN RD,SUITE 226
SCOTTSDALE,ARIZONA 85260
78.SEAN MORIARTY- CEO ENOM - 58808 LAKE WASHINGTON BLVD ,NE 300 KIRKLAND
,WA 98033
79. ELLIOT NOSS -CEO ENOM 5808 LAKE WASHINGTON BLVD , NE 300 KIRKLAND ,WA
98033
80.DAVID BROWN -CEO NETWORKSOLUTIONS - 12808 GRAN BAY PARKWAY
,JACKSONVILLE ,FLORIDA 32258
81. JAMIE DIMON- CEO CHASE BANK- 270 PARK AVENUE FLOOR FLOOR 12 NEW YORY
,NY 10017
82. CEO- NAME.COM- 414 14TH STREET # 200, DENVER,COLORADO 80205
83. CEO- NAMESILO.COM-1300 E. MISSOURI AVENUE ,SUITE 110 PHOENIX ,ARIZONA
85014
84. JEFF BERRY- CEO - HUGEDOMAINS.COM 2635 WALNUT STREET DENVER
,COLORADO 80205
85. ANDREW BERRY CEO HUGEDOMAINS.COM - 2635 WALNUT STREET DENVER
,COLORADO 80205
86. TODD HAN-CEO- DYNADOT,LLC- PO BOX 701 ,SAN MATEO,CALIFORNIA 94401
87.CEO-DROPCATCH.COM -2635 WALNUT STREET ,DENVER COLORADO 80205
88.(CEO)-FASTDOMAIN.COM-1500 N PRIEST DR,SUITE 200 TEMPE ,ARIZONA 87281
88.CEO-ASICO TECHNOLOGIES- EMAIL:sales@ascio.com
89.JEFF FOX -CEO OF HOSTGATOR / ENDURANCE INTERNATIONAL -10 CORPORATE
DRIVE ,BURLINGTON MA 01803
90.ELLIOT NOSS - CEO OF TUCOWS -5808 LAKE WASHINGTON BLVD NE #201 KIRKLAND
WA 98033

91. ROB VILLENEUVE-CEO- REBEL.COM-EMAIL; ABUSE@REBEL.COM
92. CEO- 123 REG LIMITED -EMAIL; 123REG@portland.communications.com.Address;- (CEO)
123 REG,THE SHIPPING BUILDING,OLD VINYL FACTORY,252-254
BLYTHRORB,MIDDLESEX,ENGLAND UB31HA
93 CEO-NAMESAY LLC- 2635 WALNUT STREET DENVER COLORADO 80205
94. SCOTT WAGNER- CEO- WILD WEST DOMAIN-14455 NORTH HAYDEN ROAD ,SUITE 226
SCOTTSDALE ARIZONA 85260
95. BRUCE WINN- CEO -CSC CORPORATION -251 LITTLE FALLS DRIVE WILMINGTON ,DE
19808
96. ACHIM WEISS-CEO-1 AND 1 INTERNET AG- 701 LEE RD. SUITE 300 CHESTERBANK PA
19087
97 kawada adams-Superintendant of ALBANY NEW YORK SCHOOLS -1 academy park
,albany new york 12207
98. SEAN REILY-CEO -LAMAR ADVERTISING- 5321 CORPORATE BLVD,BATON ROUGE,LA
70808
99. COREY STEMP - CEO-CHOOSEHAPPYCLOTHING.COM -222 WEST KENNEWICK
AVENUE KENNEWICK WA 99336
100. KATIE STEM-CEO CHOOSEHAPPYCLOTHING.COM -222 WEST KENNEWICK AVENUE
KENNEWICK WA 99336
101.WALKER WILLIAMS -CEO -TEE SPRING -3 DAVOL SQ STE B200 PROVIDENCE RI
02903 102.
*10 2-*EVANS CLAYTON -CEO -TEE SPRING -3 DAVOL SQ STE B200 PROVIDENCE RI 02903
103.MARC ECKO- CEO ECKO APPAREL-501 WEST 38TH STREET NEW YORK,N.Y.10018
104.JURGEN STARK -CEO TURTLE BEACH COMPANY-11011 VIA FRONTERA SUITE A
SAN DIEGO,CA 92127
105. ADENA FRIEDMAN - CEO NASDAQ -1 LIBERTY PLAZA -165 BROADWAY NEW YORK
,N.Y. 10006 106.
*10 6-*SHERGFANG CHEN -CEO- EB- FRAGRANCE/EAST-B CORP/CHOOSE FRAGRACES -1135
WESTMINSTER AVENUE,ALHAMBRA ,CA 91803

.....JURISDICTION AND VENUE

1.The court has subject matter jurisdiction over this action pursuant to 18USC 1964..
2.TheVenue is proper in this district pursuant to 18 USC 1965 and 28usc1391 because plaintiff resides in this district and in New York ,defendants is subject to personal jurisdiction in this judicial district ,is targeting and defrauding plaintiff and plaintiffs brand trademark companies and product lines in new york , from other states, and in new york which enjoins the defendants Note that RICO provides that process may be served in any judicialdistrict in the united states when required by the end of justice , in this district court,that has subject matter,jurisdiction over this action pursuant to 18usc1964

.....STATUE OF

LIMITITATIONS.....

Plaintiff also alledges of not discovering the fraudulent schemes by the named defendants until 2015,in which the defendants are suppose to be, accredited search engine providers,emailing plaintiff to subitt domain into their computer server blast engines to get traffic,to conceal that they where actually diverting and collecting profit from the activity. US A law officials,officials from the intelligence agencies did not contact the public of the ponzi like scam by named defendants ,and has acted as protection rackets for them,allowing the conduct,The named defendants had continued the conduct on to plaintiffs other brand trademarks in the similar manner in which plaintiff was able to discover in 2015,the pattern and method of the defendants using their computer servers as a access device to defraud plaintiff and use trade secrets of brand companies and product lines.....

.....INTRODUCTION

Plaintiff is a native New Yorker moving to New York in 1975,from Conniecut at 11 years old. Plaintiff worked at age 18 from 1982-1998 ,in Hauppauge New York,Deer Park New York ,Farmindale New York Melville New York manufacturing assorted products including toys,apparel,cosmetics, in many factories including Cosmetic Giants DELL LABS and ESTTEE LAUDER. Plaintiff in 1997 in Mastic New york started,named and formed as a sole proprietor brand name company business GORGEOUS JEANS INTERNATIONAL TM Plaintiff filed a DBA business certificate ,and formed full brand name product line of streetclothes,cosmetics,fragrances magazines,footwear,swimwear food products, and online matching domain brand name in 1998 www.gorgeousjeans.com .Plaintiff formed the company in the dot com boom ERA , to generate millions of dollars in profit and advertised nationwide 24/7 the online website www.gorgeousjeans.com plans to go public, marketing ,to gain stockholders attention.Plaaintiff automatically obtained common law trademark rights in 2003 after 5 years of forming and upon information and belief obtaining famous trademark rights as other brand companies in 2003-2019.Plaaintif formed 2 other companies in 2013 ,INSIDE LIMOS CLOTHING TM ,and HERE -DEAR INTERNATIONAL TM,CHUONG OO CHOOSE ,FRANKIE SALLY , with full product lines, and registering matching domain names of the High quality brand companies..There was no other product line with similar,as of incorporating plaintiffs brand trademark names. plaintiff..is the first to use in commerce and are of plaintiffs intellectual property rights worth billions of dollars in commerce in which plaintiff has sole rights and usage.

..... Named defendants cyberstalked /stalked/ and or participated in multiply racketeering/fraudulent activity to obtain plaintiffs brand company /and or companies and product lines in unfair trade practices,common law trademark infringement,cyberstalking/stalking,racketeering in violation of RICO. Defendants/from austrialia/california/washington state/kentucky/and new york city cyberstalked/stalked plaintiffs New York brand trademark company/and or companies after seeing online company and intentionally caused plaintiff and plaintiffs brand trademark company /and or companies damages in loss profits ,loss profits as other brand trademark companies and nation wide corrective advertising damages, and relocation damages. Plaintiff is the founder of named brands ,which are high end designs that can generate plaintiff and plaintiffs company millions to billions of dollars in profit,profit as other brand companies.There is nothing frivilous,or baseless,or no merits

(6)

about,being allowed to profit millions to billions of dollars off own company, ceasing and deceasing anyone else from usage,or collecting un just profit,or suing for intentional damages to plaintiffs brand trademark company/and or companies and product line in which plaintiff ,has the right with out abuse of process or arbitrary predjudice, One or more of the named defendants have a pattern of similar conduct to other company/and or companies and counterfeiting /selling others brands and plaintiff is suing all named defendants and state a claim under the following for damages in the amount of \$34.960 BILLION DOLLARS:

- 1.RICO.1962(a)(b)(c)(d)
- 2.COMMON.LAW.TRADEMARK.INFRIDGEMENT,UNFAIR COMPETITION, FALSE DESIGNATION OF ORIGIN,OF THE LANHAM ACT 43a1125
- 3.STALKING/CYBERSTALKING..UNDER.2261(A)(B)
- 4.DEPRIVIATION.OF.RIGHTS.UNDER.18USC241,18USC.242
- 5.FRAUD..UNDER.USC1064..43(a)1125.
- 6.CYBERSQUATTING.under.ANTICYBERSQUATTING.act.1996.43A1125.....
..... Defendants did commit 2 or more predicate offenses in a manner in which they calculated and premeditated intentionally ,and intentionally to threaten continuity of wide spread racketeering activity which affect interstate and foreign commerce ..

..... 1.upon information and belief and evidence defendants #1,2,3,4,5,6,7,8,9,10,11,12,15,17, are the Ceo's of the enterprises.yahoo, msn, google, bing, go duck go ,ask, you tube,facebook and computer programmers. In as early as 2004, and 2010 at various times and continuing , named defendants at their place of businesses , targeted,cyberstalked,stalked plaintiffs online company ,acting in concert and used their business as a criminal business enterprise computer, computer servers ,internet as a access device. to defraud plaintiffs brand trademark GORGEOUS JEANS INTERNATIONAL TM .Defendants intentionally and knowingly inserted thousands to millions of other businesses that they solicited to place in the online search of plaintiffs online company GORGEOUS JEANS INTERNATIONAL TM ,www.gorgeousjeans.com in their computer servers to defraud plaintiffs brand trade mark company and collect profits off plaintiffs brand trademark company name Defendants used emails to contact plaintiff as helpful accredited search engine providers of dot com businesses to get traffic by plaintiff injecting company domain www.gorgeous.com into their blast engines,to conceal that the defendants were actually defrauding plaintiff and plaintiffs brand trademark company.Defendants solicited, ,and collecting profits from thousands to millions of other businesses knowingly and intentionally to divert online traffic and profit away from plaintiffs online company to themselves ,in unfair trade practices,common law trade mark infridgement ,false designation of origin,fraud,computer fraud,wire fraud,mail fraud,scheme to defraud,cyberstalking,stalking,interference with commerce,racketeering ,violating and in violation of RICO (a) collecting and /or receiving income derived from a pattern of racketeering activity.(b) Maintaining and /or controling a business engaged in racketeering activity (c)conspiracy to engage or participate in a RICO enterprise engaged in racketeering.Named defendants conduct appears to be of one or more that conspired to harm plaintiff over brand trade mark company/and or companies and product line in violation of extortion under the hobbs act.SEE EXTORTION .SEE 43a1125 common law trademark infidgement, false designation of origin,economic espionage,unfair trade practices,18USC 1029,1030,1343,1341,1346,1951,1961, 18 USC183CYBERSTALKING/STALKING 2261(a)(b),SEE RICO 1961-1962(a)(b)(c)(d)
2.The same named defendants # 1,2,3,4,5,6,7,8,9,10,11,12,15,17,in as early as 2004,2010 and continuing,continued schemes to defraud plaintiff,in furtherance ,again used their businesses as a criminal enterprise and computer servers as a acess device to create online search pages of plaintiffs product line GORGEOUS JEANS INTERNATIONAL TM to divert commerce to plaintiffs online company. Named defendants conspired co-defendants to intentionally and knowingly and fraudulently inject the multiply similar /as of/incorporating cyber sqatted domains of co

defendants into their created online search pages on their computer servers of plaintiffs brand trademark GORGEOUS JEANS INTERNATIONAL TM and product line . The acts of mass businesses with identical company brand trademarks of plaintiffs company appearing online ,where not isolated incidents of different businesses and individuals with the same company ideas at the same time but of the named organized defendants using their computer servers as a access device to manipulate and defraud online commerce and profits to plaintiffs brand trademark company GORGEOUS JEANS INTERNATIONAL TM and product line in unfair trade practices,common law trademark infringement, false designation of origin, wire fraud, mail fraud,scheme to defraud,traficing in counterfeit goods,interference with commerce,cybersquatting,cyberstalking,stalking,computer fraud, economic espionage ,racketeering in violation of RICO (a) collecting and receiving income derived from a pattern of racketeering(b)Acquisition and maintainance, and control of a enterprise engaged in racketeering activity SEE 43a1125,18USC1343,1341,1346,18USC2320,18USC 183,18USC1951,18USC1029,1030,18USC1961SEE RICO 1961-1962 (a)(b)(c)(d)

3.Upon information and belief and evidence ,and plaintiffs discovery in 2015 defendant #6 marrisa mayer the ex ceo of search engine company yahoo in as early as 2004 at place of business targeted, and participated in acts to defraud plaintiffs company brand trademark and cosmetic trademark product line,using the computer servers at yahoo as a access device to defraud plaintiffs company. Defendant #6 as ceo of yahoo knowingly and intentionally interfered with commerce to plaintiffs interstate website , injecting thousands to millions of other companies in yahoos computer servers in the online searches of plaintiffs online website www.gorgeousjeans.com to divert commerce away from plaintiffs website www.gorgeousjeans.com to intentionally cause a false designation of origin, and then collect income and payments from the a fraudulent ctivity and investing the income back into the yahoo business.In 2015 defendant #6 left employment at yahoo and as chairman of walmart , defendant and walmart CEO defendant # 31 conspired to scheme to defraud plaintiff and plaintiffs brand cosmetic product line GORGEOUS JEANS INTERNATIONAL TM-FLAMBOYANT FRAGRANCES and COSMETICS with co defendant #28 David Mcconnell . The named defendants are all in association with one another which enjoins them , intentionally and knowingly and fraudulently manufacturing and selling in commerce the as of and incorporating brand trademark cosmetic line of plaintiffs brand trademark cosmetic line GORGEOUS JEANS INTERNATIONAL TM -FLAMBOYANY FRAFRANCES and COSMETICS on line at walmarts ,and norstorm stores,obtained fraudulently by cyberstalking/stalking/economic espionage and cybersquatting/infridging on plaintiffs brand trademark,using the internet and mails in furthernce of their schemes, in unfair competition ,common law trademark infringement,cybersquatting, interference with commerce, wire fraud, mail fraud scheme to defraud, trafficking in counterfeit goods,economic espionage,racketeering, in violation of RICO (a) collecting and receiving income derived from a pattern of racketeering activity (b) maintaining and controlling a enterprise in a pattern of racketeering activity (c) participating in a RICO enterprise (d) conspiracy to engage in a pattern of racketeering activity SEE 1343,18USC1341,18USC1346,18USC2320,18USC183,11961 .SEE 43a1125,18 USC 1951, 2261(a)(b) 18USC 8USC1961-1962 (a) (b) (c)(d) e corrective advertising damages. SEE 1341,1343,1346,

4..Upon information and belief and evidence and plaintiffs discovery in 2015 and continuing in as early as 2004 defendant # 28David Mcconell of australila seen plaintiffs online nation wide advertisement of going public ,and stalked plaintiffs usa company from australila. Defendant #28 knowingly and intentionally cyber squatting the domain name of plaintiffs company brand trademark ,and cosmetic product line GORGEOUS JEANS INTERNATIONAL TM - FLAMBOYANT FRAGRANCES-COSMETICS, registering in 2004 www.gorgeouscosmetics.com in violation of the 1999 Anticybersquatting act .. Defendant #28 knew that plaintiff was based in new york, and new jersey area and went out west to california to avoid and conceal plaintiff detection of defendants scheme to defraud. plaintiffs New York based company brand trademark and cosmetic brand trademark product line.Defendants #29 Kim Kardashian west and defendant #30 Kyle kardashian conspired to intentional cause a false designation to plaintiffs cosmetic brand ,making nation wide internet videos with co-defendant in about 2009 ,to sabotaging plaintiffs brand in which they where and are competitors with their own cosmetic

brand . Defendants used their celebrity to intentionally promote co-defendant from australia who was from australia in california fraudulently using plaintiffs brand trademark comany name and cosmetic brand trade mark. Their participation in aiding defendant #28 in fraudulently defrauding plaintiffs brand trademark product line enjoins them,in the racketeering activity,in which they intentionally participated out of malice for plaintiffs brand as competitors. A search online would reveal that plaintiff is the founder and owner of the gorgeous cosmetic brand with the formation of GORGEOUS JEANS INTERNATIONAL TM,in which plaintiff has promoted nation -wide online taking GORGEOUS JEANS INTERNATIONAL TM public with full product line.Defendant # 28 david mcconnell from australia also went to several u.s states except new york,knowing plaintiff resided, and conspired with co defendants #31,#35,#43,#6 to sell plaintiffs brand trade mark cosmetic product line in their stores, and online stores using the internet and mail delivery in furthurance of their schemes to defraud plaintiff and plaintiffs product line .The named defendants association.with.one.another.enjoins. them.Defendants # 6,28,29,30,31,35,43,conspired with search engine co defendants # 1,2,3,4,5,6,7,8,9,10,11,12,15,17, to cause a false designation of origin by using the of co defendants computer servers ,who created a separate search page of gorgeous cosmetics. Defendant# 28 claim to have started the brand gorgeous product line in in australia.,in which defendant actually was using brand name ACADEMY.Defendant.came to the usa after 1997,when plaintiff formed GORGEOUS JEANS INTERNATIONAL TM ,and was operating a company called The Acadamy, and traveled back and forth to California and australia claiming ownership of plaintiffs company brand cosmetic line and trademark brand identity name in economic espionage, unfair trade practices,cybersquatting, false designation of origin, cyberstalking, stalking, wire fraud, mail fraud, Interfering with interstate and foreign commerce,trafficing in counterfeit goods,racketeering,in violation of RICO.SEE.43a1125,18usc183,2261

(a)(b),18USC1341,18USC1343,18USC1346,18USC1951,2320,18USC1961-1962(a)(b)(c)(d)

5.. Upon information and belief, and evidence defendant #33 HELEN GIBSON in as early as 20012 and continuing and upon discovery in 2015 and in 10 calendar years defendant # 33 participated in schemes to defraud plaintiff and plaintiffs company brand trademark product line . Defendant #33 started a hair salon HELLO- GORGEOUS at unknown date , a investigation by plaintiff of start up dates, online are falsified,altered, and tampered, including registration dates of domain registration date on go daddy showing 1997.Go da daddy.com was not a domain registra,1997 .Network solutions was the only registra.Posts online call company a scam company. Dates on the wayback websites with hello gorgeous are altered to appear that defendant sold cosmetic line .Defendant #33 intentionally tried to conceal that defendant never sold any gorgeous products before plaintiffs 1997 company or even possible registered the domain as recorded online with go daddy.com before plaintiffs registered 1998 domain www.gorgeousjeans.com with networksolutions. com .Defendant #33 conspired with search engine defendants# 1,2,3,4,5,6,7,8,9,10,11,12,15,17, in a scheme to defraud the product line brand trademark from the plaintiff. Defendant #33 and Hair Salon Hello Horgeous have 0 prior use ever of a gorgeous product line before plaintiff formed the 1997 company brand name GORGEOUS JEANS INTERNATIONAL TM and full product line and matching brand name full product line . Defendant #33 sold full or part ownership to possible co- defendants and associates possible law enforcement agents or ex law enforcement agents,in.whicg defendants discovery will reveal.ownerships and start up dates .of company .Plaintiff has received stalking like incidents and bias unequal treatment from law enforcement and public officials in which plaintiff has.probable cause to believe are participants.in multiply. of schemes to defraud plaintiffs companiy GORGEOUS JEANS INTERNATIONAL TM and other brand trademarks formed by plaintiff . Defendant #33 franchised salon claims to be non profit .In 2012 ,and is actually selling infridging and counterfeit goods as of /similar of plaintiffs brand trademark for profit.. Defendant # 33 conspired with search engine defendants #1,2,3,4,5,6,7,8,9,10,11,15,17,which enjoins defendant #33 in the complaint,racketeering activity, to use co- defendants computer servers as a access device to intentional and knowingly insert Defendant.#33 HELLO GORGEOUS product line of apparel,cosmetics,fragrances,in separate created pages in search on co defendants# 1,2,3,4,5,6,7,8,9,10 computer servers in search of plaintiffs product line of apparel,cosmetics,fragrances,in unfair competion, and infridging on plaintiffs brand trade mark GORGEOUS JEANS INTERNATIONALTM, and product lines.

Plaintiff did not know of the salon existed until a news report about person being called Vinny Gorgeous owning a franchised hello gorgeous salon and went to jail in 2013. Defendant# 33, in as early as 2012 and continuing cyber stalked plaintiffs online company and created domain name shop hello gorgeous.com to compete with plaintiff brand trademark in unfair competition,manufactured and started selling gorgeous product line items of plaintiffs gorgeous product lineto cause a false designation of origin. Plaintiff advertised 2015-2018 plans for a casino hotel coming soon upstate ny ? in which defendants registered at the trademark office a similar mark to opening a similar venue , in a continued scheme to cause a false designation of origin,after seeing plaintiffs 2015-2018 website to form a casino after going public.Defendants motives are about the plaintiff taking company public, and fraudlently obtaining the intellectual property rights of plaintiffs and product line that is essential to taking public and stockholders investing . Defendants hello gorgeous salon,motives are to take hello -gorgeous pubic, has no bases for huge profits to take their company public,. Investors would not invest in a hair salon in which does not create enough revenue, they have never advertised to take company public. The named defendant#33 conspired to obtained the intellectual property rights of plaintiffs intentionally infrigding on plaintiffs brand trademark product line, in unfair trade practices, and causing a false designation of origin,trafficing in counterfeit goods,wire.fraud,mail.fraud,scheme.to.defraud,cyberstalking,stalking,racketeering ,interference with interstate commerce,economic espionage,in violation of RICO.SEE. 43a1125,18USC1343,18USC1341,18USC1346, 18USC2320,2261(a)(b),18USC 1961-1962 (a)(b)(c)(d)

6.Upon information and belief and evidence named defendants#27,32,34,35,37,38,41,42,43,43,44,45,46,47,48,50,52,53,54,101,102,103,106106,108 108 are competitors of plaintiffs with their own brand name company.Defendant.participated with co defendants 1,2,3,4,5,6,7,8,9,10,11,15,17, in schemes to defraud one or more of plaintiffs company and /or companies and product line GORGEOUS JEANS INTERNATIONAL TM ,INSIDE LIMOS CLOTHING TM,HERE- DEAR INTERNATIONAL TM,CUONG OO CHOOSE,FRANKIE SALLY INTERNATIONAL TM . Named defendant #106 Shergfan Chen intentionally derived plaintiffs brand through fraud and created the fragrance line of plaintiffs brand trademark compampany and fragrance line chuong oo choose selling the fragrance brand in 99 cent stores from california in which defendants are based.The named defendants as competitors ,created similar /as of/infridging counterfeit goods of plaintiffs brand trademark in unfair trade practices,common law trade-mark infridgement, false designation of origin.The named defendants targeted, cyberstalked/ stalked plaintiffs brand products and fraudulently created as of/similar/incorporating products and used co-defendants computer servers , the internet and mail receiving services in furtherance of their scheme to colect profits derived from a pattern of racketeering,to defraud plaintiff, in economic espionage,wire fraud,mail fraud, interference with interstate commerce,trafficing in counterfeit goods, ,racketeering in violation of RICO(a) collecting income deprived from a pattern of racketeering (b) controlling and maintaining of a business enterprise engaged in a.pattern of racketeering (c) participating in a RICO enterprise (d)conspiracy to engage in a RICO enterprise. .SEE 43a1125,2261(a)(b) ,18USC 1343,18USC1341,18USC1346,18USC 2320,18USC183,SEE 1962 (a)(b)(c)(d)

7.Upon information ,belief and evidence and upon plaintiffs discovery in 2015-2018 in as early as 2004 and continuing the named domain regisra's defendants#77,78,79,80,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96.cyberstalked plaintiffs brand trademark company /and or companies,obtaining plaintiffs trade secrets and knowingly and intentionally used their computer servers as a access device to intentionally and knowingly register multiply cybersquatted domain names of plaintiffs brand trademark /and product line in violation of the 1996 cybersquatting laws. The defendants -used their business as a criminal enterprise and used their computer servers as a access device ,internet and mail in furtherance.One or more of the defendants created and formed shell companies of plaintiffs brand trademark company/and or companies and product line and sold counterfeit goods of plaintiffs . The defendants than conspired with computer search engine co-defendants #1,2,3,4,5,6,7,8,9,10,11,12,15,17, to place the cybersquatted domain names in co defendants computer servers to cause a false designation of plaintiffs brand trademark company /and or companies and product lines. The defendants used the internet and mail in furtherance of their

(10)

scheme to defraud plaintiff,in unfair competition,common law trade mark infringement ,false designation of origin ,wire fraud,mail fraud,economic espionage,trafficing in counterfeit goods,cyberstalking/stalking,racketeering.in.violation.of.1996 .ANTICYBERSQUATTING LAWS 15USC1125,and. RICO (a)collecting income derived from a pattern of racketeering activity(b)maintaining a business engaged in a pattern of racketeering activity. (c) participating in a enterprise engaged in racketeering activity (d) conspiracy to engage in a RICO enterprise SEE 43a1125,18USC 1346,18USC 1343,18USC1341,18USC1951,18USC

183,18USC1029,18USC1030,SEE RICO 1961-1962 (a)(b)(c)(d)
 8.upon information and belief and evidence ,and plaintiff discovery in 2015,in as early as 2016 ,same search engine defendants #1,2,3,4,5,6,7,8,9,10,11,12,15,17 continued cyber stalking plaintiff and plaintiffs other brand trademark company /and or companies and product lines INSIDE LIMOS CLOTHING TM , HERE DEAR INTERNATIONAL TM,CHUONG OO CHOOSE INTERNATIONAL TM,FRANKIE SALLY INTERNATIONAL TM in the same pattern obtaining and soliciting and selling plaintiffs company brand trade secrets . Defendants used their business as a criminal enterprise and computer servers as a access device to again interfere with commerce to plaintiffs online websites. Named defendants removed plaintiffs 2016 online website www.insidelimosclothing.com from the search of plaintiffs own online company ,and in a continued pattern, solicited and injected thousands to millions of other companies in the search of plaintiffs online website .to divert traffic and profits away from plaintiffs online company and collect and receive profit to themselves .Defendants would place plaintiffs website back in their computer servers when they think plaintiff was watching, and then remove from their computer servers when they thought plaintiff was not. One or more of the defendants conduct is consisted of related incidents to cause harm to plaintiff to obtain the brand trademark company/or companies and product linesin violation of the hobbs act1951. Named defendants are in association with one another,in the fraudulent acts that enjoin them.in unfair trade practices,common law trade mark infringement, false designation of origin, cyberstalking, stalking, economic espionage ,interference with interstate commerce,computer fraud,wire fraud,mail fraud,scheme to defraud,racketeering,in.violation.of.RICO.(a).collecting.income derived.from.a.pattern.of.racketeering.activity.(b)maintaining of a enterprise in a pattern.of.racketeering..activity.(c)participation in a racketeering enterprise (d) conspiracy to conduct a RICO enterprise SEE.

43a1125,2261(a)(b),18USC183,18USC1951,1343,18USC1341,18USC1346,18USC
 1029,18USC1030 .SEE RICO 1961-1962 (a)(b)(c)(d)

9. Named defendants#50 ,#51 CEO of Disney and Pixar knowingly and intentionally obtained the name INSIDE OUT through fraud, and economic espionage ,and used in a 2015 computer movie INSIDE -OUT similar as of plaintiffs company brand trademark INSIDE LIMOS CLOTHING TM .The defendant#50 ,#51 are all associates and investors of co-defendants #1,2,3,4,5,6,7,8,9,10,11,12,15,17, which enjoins them in the complaint.Discovery will further reveal the associations.Defendants #50,51 started manufacturing and selling a apparel line of sublimation clothing similar as of plaintiffs sublimation apparel on co defendants#3,8,13,14, computer servers and websites using co- defendants#1,2,3,4,5,6,7,8,9,10,11,12,15,17 computer servers , internet and mail receiving services to collect income derived from the pattern of racketeering activity.The defendant #50,#51, 2015 movie INSIDE OUT title has no bases as a title,defendant #50,51 have never had a flashy clothing line,in which was derived from plaintiffs unique flashy high-end style,in which plaintiff is the first to form a INSIDE CLOTHING LINE and LIMO /LIMOUSINE LINE of products.,in which are the intellectual property rights of plaintiff,who is entitled to sole usage in commerce.The named defendants obtained fraudulently to clone disrupt and sell the identity product brand trademark line of plaintiffs company INSIDE LIMOS CLOTHING TM. Defendants name INSIDE OUT, and clothing apparel ,and product line was derived from a pattern of cyberstalking, frudulent racketeering activity against plaintiff and plaintiffs brand trademark companies, in un fair trade practices,economic espionage, cyberstalking,stalking,common law trade mark infringement, false designation of origin, trafficing in counterfeit goods,computer fraud,wire fraud, mail fraud,scheme to defraud,in violation of RICO (a) income derived from a pattern of racketeering activity (b)maintaining a enterprise in a pattern of racketeering activity(c) participating in a RICO enterprise (d) conspiracy to violate RICO .SEE

(11)

43a1125,18USC183,18USC
1029,18USC1030,18USC1341,18USC1343,18USC1346,18USC2320,2261(a)(b).SEE RICO
1961-1962 (a)(b)(c)(d)

10.Upon information and belief and evidence around 2018 defendants #3,6,8,13,14,16,22,25,26,31,44,45,46,47,48,58,59,60,45,46,47,61,62,used their websites, and computer servers to cyberstalk and harrass plaintiff and brand trademark companies .The named defendants conspired to sell manufactured counterfeit product apparel and products of plaintiffs brand trademark INSIDE LIMOS CLOTHING TM ,and other brands as of /cloned/similar/incorporating/infridged/ fraudulently derived from cyberstalking/ stalking plaintiffs brand trademark company /and or companies and product line and use the internet and mail to collect the profits. The named defendants #45,#46,#47 received investments from named search engine giants defendants # 1, and #2 to manufacture and sell counterfeit goods /as of/similar incorporating plaintiffs brand trade marks, and product lines. Discovery from the defendants would reveal the other defendant investors, which enjoins them all in this racketeering complaint. One or more of the defendants conduct is to harm plaintiff,(including posting a threatening t-shirt designs,with a hearse car,etc) to obtain plaintiffs brand trademark, and product lines in violation of the hobbs act.. The defendants used income derived from the racketeering activity to manufacter, and sell counterfeit goods of plaintiffs trademark brand company /and or companies and product lines and collect profits in violation of RICO (a) collecting income derived from a pattern of racketeering activity (b) maintaing and controlling a enterprise in racketeering activity (c) participation in racketeering activity(d) conspiracy to violate RICO. The named defendants #45,46, used the computer servers of co-defendants who cyberstalked plaintiffs brand trademark company and conspired to defraud plaintiff and plaintiffs t-shirt apparel line ,and use the internet and mail services to collect profits off plaintiffs brand trade mark T-shirt apparel line in unfair competition ,common law trademark infridgement, false designation of origin ,cyberstalking, wire fraud, mail fraud ,scheme to defraud,computer fraud,economic espionage,racketeering. .SEE 43 a1125, 15usc1125,18USC1343,18USC1341,18USC1346, 18usc2320,18 USC1951,2261(a)(b)
SEE RICO 1961-1962 (a)(b)(c)(d)

11.Upon information ,belief and evidence ,defendant # 55JEFF PIGOZZI and #56 KD WAVE cyberstalked plaintiffs brand trademark INSIDE LIMOS CLOTHING TM and schemed to defraud plaintiffs brand intentionally and knowingly forming a similar apparel line, and falsifying start up dates to intimidate plaintiff and plaintiffs company, using the internet and mail to post for sell limo apparel of plaintiffs brand trademark on co-defendants #3, computer servers facebook to collect and receive profits, in unfair competition ,common law trade mark infridgement,cyberstalking,economic espionage, wire fraud,mail fraud,scheme to defraud,racketeering in violation of RICO.(c) .(d) SEE 43a1125,18USC 183,18USC1341,18USC1343,18USC1346,2261(a)(b).SEE RICO 1961-1962 (a)(b)(c)(d)

12.Upon information and belief ,evidence defendants#32KANYE WEST and #57 LIMOS AND LIQUOR schemed to defraud plaintiff and plaintiffs company INSIDE LIMOS CLOTHING TM . The named defendants cyberstalked plaintiffs brand trademark company INSIDE LIMOS CLOTHING TM and product lines, and beverage liquor product line ,conspired and intentionally and knowingly formed a similar and infridging name on apparel.LIMOS And liquor ,placing designs of kanye wests JESUS on the apparels,incorporating Kanye West as the founder/owner/investor of LIMOS and LIQUOR brand apparel fraudulently derived from plaintiffs brand trade mark in economic espionage,unfair trade practices,common law trademark infridgement,trafficing in counterfeit goods, wire fraud,mail fraud, cyberstalking,in a pattern of racketeering activity on plaintiffs brand trade marks.The named defendants #32,#57 in furtherance used, co defendants computer servers #1,2,3,4,5,6,7,8,9,10 of separted searches of plaintiffs product line,which enjoins them all in this complaint. The named defendants used the internet and mail to collect and receive income in violation of RICO (a)Receiving income derived from a pattern of racketeering activity (c) participation in a RICO enterprise (d) conspiracy to engage in a pateern of racketeering SEE 2261(a)(b),18USC2320,18USC1343,18USC1341,1346 SEE RICO (c)(d)

13..Upon information and belief defendants # 53,#54 ceo's of Russian companies VOSTEC WATCHES and defendant #52 ceo of HONG KONG based LG ENTERPRISES obtained the trade secrets of plaintiffs brand by economic espionage and cyberstalking and fraud . The named

defendants cyberstalked plaintiffs brand trademark INSIDE LIMOS CLOTHING and product line and used their businesses as a criminal enterprise to manufacture and sell infriged/as of/cloned/incorporating plaintiffs brand trademark watch product line LIMOUSINE watches.Plaaintiff places a limo design in the watch dial.The named defendants used co-defendants #1,2,3,4,5,6,7,8,9,10,13,14 computer servers and internet and mail to collect and receive income derived from a pattern of fraudulent racketeering activity off plaintiffs brand trademark company INSIDE LIMOS CLOTHING TM in unfair trade practices, common law trademark infringement ,false designation of origin, cyberstalking, stalking, economic espionage, trafficking in counterfeit goods,wire fraud,mail fraud,scheme to defraud,interference in interstate commerce,racketeering in violation of RICO (a) income derived from a pattern of racketeering(b) maintaining,controlling a enterprise in a pattern of racketeering activity(c)participating in a RICO enterprise (d) conspiracy to engage in racketeering activity .SEE 43a1125,18USC183,18usc 1951,2261(a)(b), 18USC2320,18USC1343,18USC1341,18USC1346 SEE RICO 1961-1962 (a)(b)(c)(d)

14. Upon information and belief and evidence defendants# 8,13,14 amazon, and ebay intentionally and knowingly conspired to use their business as a criminal enterprise and their computer servers as a access device to sell ,manufactured counterfeit Tshirt apparel and the watch accessories brand of Plaintiffs INSIDE LIMOS CLOTHING Tshirt line. Defendants conspired to manufacture and post \$20 t-shirts of LIMO t-shirt apparel line in their computer servers to depration plaintiffs high -end \$75 t-shirt apparel ,and then selling counterfeit watches of plaintiffs watch line of defendants#52,53,54 Named defendants#8,13,14 used their computer servers as a access device to intentionally and knowingly infiltrate and defraud plaintiffs brand trade mark companies and product line creating searches of LIMO TSHIRT APPAREL,LIMO WATCHES, and of plaintiffs other brand GORGEOUS JEANS INTERNATIONAL TM,CHUONG OO CHOOSE,HERE-DEAR INTERNATIONAL TM. Named defendants intentionally and knowingly,selling offensive, and poorly,designed counterfeit t-shirt apparel of plaintiffs. Plaintiffs t-shirt apparel line is a high end luxury brand line that plaintiff priced sells at \$75 per t-shirts.Dendants have never sold,marketed,any limo,or limousine t-shirts , or apparel on their computer server computer until plaintiff formed in 2013. The LIMO products are counterfeit products fraudulently derived from and obtained in unfair trade practices,common law trade mark infringement,economic espionage,cyberstalking.Defendant conspired to use business as a criminal enterprise and computer servers as a access device to collect income derived from the pattern of racketeering, in violation of RICO 1962 (a) collecting income derived from a pattern of racketeering (b) maintaining and controlling a business enterprise engaged in a pattern of racketeering activity(c)participating in a RICO enterprise (d) conspiracy to engage in racketeering activity., in unfair trade practices, false designation of origin ,common law trademark infringement ,cyberstalking,stalking,economic espionage,computer fraud,wire fraud,mail fraud,scheme to defraud,interference with interstate commerce, trafficking in and selling counterfeit goods. Defendant #8 also traveled to the upstate new york area where plaintiff resides in.and.contacted law makers ,in which plaintiff was forced out of apt.related to racketeering activity of plaintiffs brand trade mark companies.Defendant # 8 conduct appears to be one or more of the named defendants ,that has conspired to harm plaintiff , in a scheme to obtain plaintiffs brand trademark companies in violation of extortion under the hobbs act,in which the named defendants are all in association with one another in the racketeering activity that enjoins them .SEE. 43a1125,2261(a)(b),18USC183,18USC1029,18USC1030,18USC1343,18USC1342,18USC1346, 18USC2320,18USC1958,18USC1951,18USC1961,EXTORTION UNDER THE HOBBS ACT SEE RICO 1961-1962 (a)(b)(c)(d)

15.Upon.information.and.belief,evidence named defendant103 TURTLE BEACH cyberstalked plaintiffs 2013 Unique brand.trade.mark.company HERE -DEAR INTERNATIONAL TM .and around about 2016-2018 defendant #103 and defendant #104 as ceo of Nasdaq used NASDAQ computers as a access device to place incorporate, and cause a false designation of origin in unfair trade practices, participating in fraudulent racketeering activity to obtain the brand trademarks of plaintiffs brand companies ,fraudulently, and intentionally using plaintiffs brand trade mark.HERE as their own on NASDAQ TRADING symbol, incorporating plaintiffs brand trademark.company.in.common.law.trade.mark.infridgement.economic espionage,wire fraud,mail fraud,scheme to defraud,interference with interstate commerce,in violation of RICO (a)collecting

income derived from a pattern of racketeering (b)controlling a enterprise engaged in racketeering activity (c)participating in a RICO (d) conspiracy to violate RICO.SEE 43a1125,15USC1125,18USC1029,18USC1030,18USC1341,18USC1343,18USC1346,2261A(A)(B)

16.Upon information and belief and evidence named defendants#66,67,68 worked in the commerce dept and under color of law and official capacity, participated in racketeering activity to defraud plaintiffs brand trademark companies and product lines. Defendants knowingly and intentionally registered multiply trademarks of plaintiffs company/and or companies and plaintiffs product line GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM,HERE-DEAR INTERNATIONAL TM , CHUONG OO CHOOSE, FRANKIE SALLY to co defendants #28,#33 and others,in which discovery will reveal..Defendants while employed at the U.S. Department of commerce targeted, cyberstalked ,and solicited out plaintiffs brand company /and or companies trademarks and product lines name. Defendants# 66,67,69 without plaintiffs knowledge or disregard for plaintiffs trademarks formed by plaintiff fraudulently and intentionally gave to co-defendant#28, #33 trademarks consistant of a bribery.CO- defendants obtained the trademarks of plaintiffs brand trademark companies knowing them to be of plaintiffs fraudulently in violation of fraud under 1064 (43) (a)1125 Plaintiff has kept nationwide ads online and a internet check would have revealed trade marks belonged to plaintiff. Defendants #66,67,68 used their computers,internet, and emails as a access device, to collect and receive income derived from a pattern of racketeering activity,in unfair trade practices,common law trademark infringement,false designation of origin, cyberstalking,stalking,computer fraud,mail fraud,wire fraud,scheme to defraud,interference with interstate commerce,economic espionage ,racketeering in violation of RICO.SEE 43a1125,1064,15USC1125, (43) (a)112518USC 1029,18USC1030,18USC1343,18USC1341,18USC1346,18USC183,18USC201,18USC1951.SEE RICO 1961-1962 (a)(b)(c)(d)

17. Upon information and belief and evidence in as early as 2002 named defendant # 80 of networksolutions domain registras cyber stalked plaintiffs brand trade mark companies and intentionally used their computers as a access device to cybersquatt domains similar/as of incorporating plaintiffs brand trade mark companies GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM, CHUONG OO CHOOSE INTERNATIONAL TM ,FRANKIES SALLY INTERNATIONAL TM in violation of the Anticybersquatting Act. .Defendant #80 and #81 ceo of Chase Bank in 2017 used their computer servers to block plaintiff from paying fees on the domain names www.insidelimos.com,and www.frankiesally.com plaintiff registered of brand trademark company product line and aka name.Defendant #81 as ceo of chase, continued retaliation acts against plaintiff in ceasing plaintiff from making overdraft charges on checking account. Defendant # 80 registered the domain names to themselves, sold them.in unfair trade practices,common law trademark infringement ,false designation of origin, cybersquatting,wire fraud ,computer fraud ,mail fraud, interference with interstate commerce,trafficing in counterfeit goods,economic espionage,racketeering in violation of RICO (a) collecting income derived from racketeering (b) controling a enterprise in a pattern of racketeering activity (c)participating in RICO (d)conspiracy to engage in RICO SEE 15 USC1125,43a1125,18USC1029,18USC1030,18USC183,18USC1341,18USC1343,18USC1513,1 8USC1346,2261 (a)(b),2320.SEE RICO 1961-1962 (a)(b)(c)(d)

18.Upon information and belief and evidence defendant #49 Jared Rowe ceo of yellow book cyber stalked plaintiff and plaintiffs company GORGEOUS JEANS INTERNATIONAL TM and participated in retaliation acts against plaintiff and plaintiffs brand trade mark company GORGEOUS JEANS INTERNATIONAL TM in a scheme to defraud plaintiffs brand trademark company.The named defendants used their business as a criminal enterprise to post fraudulent defamation posts of plaintiff and plaintiffs company GORGEOUS JEANS INTERNATIONAL TM on co defendants #1,2,3,4,5,5,7,8,9,10, computer servers of plaintiff being muslim and sold muslim products in the online searches of plaintiffs online company knowingly to be false.Defendants used the internet to intimidate consumers into not going on plaintiffs online website in unfair trade practices,fake designation of origin, cyberstalking,wire fraud,retaliation,in violation of RICO (c) participation in racketeering activity (d) conspiracy to violate RICO .SEE 43a1125,2261

(1)(b),1343,18USC1346,18USC1513

19.Upon information and belief and evidence named New York defendants#16,18,19,20,21,23,24,36,40, of.pinterest,heygorgeous,thegorgeous.magazine,gorgeouscounture,gorgeous antiques,cyberstalked stalked,cyber squatted,infridged on plaintiffs New York company brand trademark GORGEOUS JEANS INTERNATIONAL TM. Defendants from new york city #40 came to albany new york and located place of business arond the corner from plaintiffs residence in albany n.y.,to intimidate plaintiff of plaintiffs brand trademark, and brand product line. defendants #16,18,20,21,23,24,36,40,created and manufactured as of brand names and /and or/product lines of plaintiffs in unfair trade practices,common law trademark infringement,and used the internet ,computer servers of defendants #1,2,3,4,5,6,7,8,9,10 to mail , and receive profits of counterfeit goods of plaintiffs brand trademark company /and or companies and product lines in a racketeering scheme to defraud plaintiffs brand trade mark company/and or companies and product line in unfair trade practices, false designation of origin, common law trademark infridging,wire fraud ,mail fraud,scheme to defraud,interference with interstate commerce,trafficing in counterfeit goods in violation of RICO (a) collecting income derived in a pattern of racketeering (b)mainting or controling a enterprise engaged in racketeering (c) participation in a RICO enterprise (d) conspiracy to violate RICO. SEE 43a1125,18USC 1343,18USC1341,18USC1346,18USC1951,2320,2261 (2)(A)(B)

20. upon information and belief and evidence defendant # 69 michael bloomberge appears to be one of the perpatrator behind the stalking like incidents to residents in as early as 2005 and continuing in some unusual hate crime act , related to plaintiff forming the title of company brand name GORGEOUS JEANS INTERNATIONAL TM.Defendant #69 has made contact with both mayors of the towns that plaintiff relocated to in Newark NJ, and again in Albany NY in 2015, plaintiff has been immediatly after harrassed by local police, soon after defendant made contact with both mayors appearing as retaliation in exchange for bribery . Defendant #69 has given donations,cash,gifts to the areas,etc.,Plaintiff has had to relocate in response to incidents. Plaintiff has probable cause to believe defendant #69 is the perpatrator of incidents by person judge lawrence bushing in which person interupted and presided over a court case of plaintiffs,immediately after becoming a judge and sworn in by defendant #69 and tried to maliciously prosecute plaintiff and abuse the process of the courts on false assault charges ,that where dissmissed. Defendant#69 ,and co-defendants- 1,2,3,4,5,6,7,8,9,10,70, are in association,discovery from #69 will reveal.Defendant and co-defendants #3,8, stalked plaintiff to residence in albany ny and conspired to cause harm to plaintiff by bribing public officials defendants # 70,71,72,73,74 to cause harm to plaintiff, disrupt and obtain the brands of plaintiffs company /and or companies product lines.in in violation of the hobbs act ,in violation of federal stalking laws and in violation of the hate crimes act,in violation of RICO.(a) Receiving income derived from a pattern of racketeering(c) conduct and participate in a enterprise in a RICO enterprise (d). Conspiring to engage in a RICO enterprise SEE RICO 1962 (a)(c)(D),2261 A(1) (a)(b)(2)(a)(b),18 USC1958,18USC1513,18USC HATE CRIMES ACT,

21.upon information and belief and evidence ,Albany New York police participated in acts to harm plaintiff in violation of extortion under the Hobbs Act,related to defendants trying to obtain plaintiffs brand companies. The defendants #71,72,73,74 ex albany new york police chief's acting under color of law,in individual capacity, conspired with other unknown defendants to get plaintiff out of apt out of new york so that co defendants from California and australia could set up companies in New York and sell the product lines of plaintiffs brand trademark companies in New York in violation extortion under the Hobbs Act. Defendants conspired under the color of law ,and in their individual and official capacities , intentionally ,knowingly interfered with plaintiffs equal right to police protection, luring ,coiercing, armed drug dealers carrying guns to loiter and sell narcotics around plaintiffs apt. in violation of New York penal code loitering laws 240.10,240.20,240.26,240.45,240.46. Defendants allowed the drug dealers to loiter and sell narcotics on a daily base 2015-2018. . Plaintiff was made homeless by the activity.Plaaintiff was also unlawfully tracked and monitored and stalked to parks multiply times when going to workout by the albany new york police ,who where using plaintiffs phone to surveillance plaintiff and appear and intimidate causing plaintiff concern for safety.. Defendants conduct are consisted of bribery ,public corruption, and participation in the racketeering activity to obtain the

brand trademark company and /or companies and product lines of plaintiff in violation of extortion under the hobbs act,deprivation of rights,obstruction of local and state laws enforcement,bribery,murder.for.hire, and in violation of 18USC242, RICO 1962 (c)(d)18USC201,18USC1513,18USC1958,18USC1951,2261A(2) (A)(B)

22. Upon information and belief ceo of tech company tech valley defendant #75 , and defendant # 70 acting under color of law participated in retaliation acts, and acts to disrupt plaintiff in filing a civil complaint against named defendants in racketeering activity to obtain plaintiffs brand trademark company /and or companies and product lines. Named defendants intentionally disrupted and disabled internet services to plaintiff in 2015-2018, and disconnecting plaintiff from the internet services in 2018. Named defendants conspired to deprive plaintiff of free use of the internet that was free to others and to plaintiff, until defendants used the computers and computer servers to retaliate against plaintiff, disconnecting internet service to plaintiffs residence to force plaintiff to move in deprivation of plaintiffs rights, and in retaliation, in violation to RICO (c)(d) SEE 18USC1513,18USC201,18USC1961,18USC242,18USC241

23. upon information and belief defendant Tom Keppler previous landlord of plaintiffs participated in retaliation acts against plaintiff, to disrupt plaintiff in filing a civil complaint , and intentionally coercing tenants and local drug dealers to give plaintiff a hard time , telling them he wants her out, in which they would mumble around plaintiff , TOM wants her out . Plaintiff rented apt ,found on craigslist in 2013 for \$375 and paid \$400 to landlord owner per month,to tom keppler, who had no bases to evict tenant except out of retaliation for co-defendants. Defendant refused to turn plaintiffs gas heater on, or do repairs in apt in which plaintiff had to contact city housing code enforcement . Defendant filed a non payment eviction, the following month and refused to accept rent payments. Defendant participated in retaliation acts against plaintiff for the co- defendants albany new york police , and albany new york mayor,in intentional acts to make plaintiff homeless,which they did make plaintiff homeless in violation of new york state Retaliation eviction laws ,and participating in racketeering activity, in violation of RICO (c) participation in racketeering activity (d) conspiracy to participate or engage in racketeering activity. SEE 18USC1513,18USC201,18USC1961,SEE RICO (c)(d)

.....**COUNT I**

.....Income Derived from a pattern of Racketeering Activity.
or through the collection of a unlawful dept:

.....18 U.S.C. 1961 (5), 1962 (a)

1. The allegations of paragraph1 through 23 are incorporated herein by reference.
- 2.The COUNT I is against all defendants named ,except and specifically excluding the named defendants of 1962(b) (c),(d)
3. At various times and places all defendants received income from a pattern of racketeering activity ,that include common law trademark infringement ,stalking,cyberstalking, cybersquatting,fraud, and/or through a collection of an unlawful dept,directly or indirectly
4. During the past 10 years, all defendants did cooperate jointly and severally in the commission of two(2) or more of the predicate acts itemized at 18 U.S.C. 1961 (1) in violation of 18 U.S.C.1962 (a)
- 5.All defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity,a continuing threat of their respective racketeering activities,in violation of the RICO law 18 U.S.C.1962 (a)
- 6.As a direct and proximate result of the count I defendant racketeering activities and violations of 18 U.S.C 1962(a) plaintiff have been injured in their business +property.

WHEREFORE ,plaintiff request that this court enter judgement against the count I defendant as follows (.SEE RELIEF REQUESTED)

COUNT II

.... Acquisition and Maintenance of an interest in and Control an Enterprise Engaged in a Pattern of Racketeering Activity

.. 18 U.S.C.1961(5) 1962 (b)

- 1.The allegation of paragraphs 1---through-23 are incorporated here in by reference
- 2.This count is against all defendants ,except and excluding COUNT 1962(c)(d) defendants
- 3 At various times and places all named defendants ,(excluding named defendants of count III,IV,) enumerated in plaintiffs , did acquire and /or maintain ,directly or indirectly an interest in or control of a RICO enterprise of individuals who were associated in fact and who did engage in ,and whose activities did affect,interstate and foreign commerce,all in violation of 18 U.S.C.1961,1962(b)
- 4.The count II defendants have directly and indirectly acquired + maintained interests in and control of the enterprise through a pattern of racketeering activity
- 5.The racketeering activity listed above constitutes a pattern of racketeering activity pursuant to 18 U.S.C. 1961(5)
6. During the ten years,all defendants did cooperate jointly and severally in the commission of two or more of the predicate acts itemized at 18 U.S.C. 1961 (1) in violation of 18 U.S.C. 1962(b)
- 7..All defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity,a continuing threat of their respective racketeering activities,in violation of the RICO law18 U.S.C.1962(b)
- 8.As a direct and proximate result of the COUNT II defendants racketeering activities and violations of 18 U.S.C. 1962 (b) plaintiff have been injured in their business .
9. WHEREFORE -Plaintiff request that this court enter judgement against the COUNT II defendants as follows (SEE RELIEF REQUESTED)

.COUNT.III

.. . Conduct and participation in a RICO Enterprise through a Pattern of Racketeering Activity:
18 U.S.C. 1961(5) 1962 (c)

1. The allegations of paragraphs 1 through 23 here in by reference.

2 This COUNT III is against all defendants

4 Named defendants is a enterprise engaged in and whose activities affect interstate and foreign commerce. The count III defendants are employed by or associated with the enterprise.

5.The COUNT III defendants agreed to and did and conduct and participate in the conduct of the enterprises affairs through a pattern of racketeering activity and for the unlawful purpose

6. At various times and places enumerated in plaintiffs documentary material,all defendants did associate with a RICO enterprise of individuals who were associated in fact and who engaged in ,and whose activities did affect ,interstate and foreign commerce. All defendants did conduct and /or participate either directly or indirectly,in the conduct of the affairs of said RICO enterprise through a pattern of racketeering activity in violation of 18 U.S.C. 1961(5),1962 (c)

7..During the ten years,all defendants did cooperate jointly and severally in the ..commission of two or more of the predicate acts itemized at 18 U.S.C. 1961(1) in violation of 18 U.S.C. 1962 (c)

8.All defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten a continuity , a continuingthreat of their respective racketeering activities ,in violation of the RICO law 18 U.S.C. 1962 (c)

9 The count III defendants have directly and indirectly conducted and participated in the conduct of the enterprises affairs through the pattern of racketeering and activity described above in violation of 18 U.S.C. 1962 (c)

10.. As a direct and proximate result of the count III defendants racketeering activities and violations of 18 U.S.C. 1962 (c) plaintiff have been injured in their business.

..... WHEREFORE -Plaintiff request that this court enter judgement against the count III defendants as follows (SEE X-----)

COUNT IV

.....
..... Conspiracy to Engage in a
..... pattern of Racketeering Activity :
..... 18 U.S.C. 1961 (5) 1962 (d)

1. The allegations of paragraph
1 through 23 are incorporated here in by reference

2. This

COUNT IV is against all named defendants

3. At various times and places partially enumerated in plaintiffs documentary material all defendants conspired to receive income derived, directly or indirectly from a pattern of racketeering activity ,or through collection of an unlawful debt in which such persons has participated which is engaged in or the activities affect interstate or foreign commerce in violation of 18 USC 1962 (a) (d)

4..At various times and places partially enumerated in Plaintiffs documentary material, all defendants did conspire to acquire and maintain an interest in a RICO enterprise engaged in a pattern of racketeering,in violation of 18 U.S.C.1962 (b)(d)

5 At various times and places partially enumerated in plaintiffs documentary material all defendants did also conspire to conduct and participate in said RICO enterprise through a pattern of racketeering activity in violation of 1962 (c) (d)

6.During the ten years,all defendants did cooperte jointly and severally in the commission of two (2) or more of the predicate acts itemized at 18 U.S.C. 1961 (1) in violation of 1962 (d)

7. All defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten a continuity ,a continuing threat of their respective racketeering activities,in violation of the RICO law 1962 (d)

8. As a direct and proximate result of the count IV defendants conspiracy,the overt acts taken in furtherance of that conspiracy ,and violation of 18 U.S.C. 1962 (d) plaintiff have been injured in their business and property in that

.....
WHEREFORE ,plaintiff requests that this court enter judgement against the
COUNT IV defendants as follows (SEE RELIEF REQUESTED)

PLAINTIFF DEMAND TRIAL BY JURY

*Sheila Robinson
Amie A.*

DATE 7/18/2019

COUNT V

COMMON

LAW TRADEMARK INFRINGEMENT ,UNFAIR TRADE PRACTICES, FALSE DESIGNATION OF ORIGIN UNDER 43a1125 /15USC1125

1.The named defendants # 1-69, #77- #108 did knowingly and intentionally cyberstalk /stalked /and or cybersquatted plaintiffs brand trademark company /and or companies and created/manufactured/and sold online/nationwide as of similar/incorporating plaintiffs brand trademark to cause a false designation of origin of plaintiffs company brand trademark and product lines.

2.The named defendants did intentionally cause a false designation of one or more of plaintiffs name brand trademark companies and product lines using similar /as of/incorporating brand trademark names and products of plaintiffs brand trademarks and product lines

3.The named defendants intentionally and knowingly created /manufactured/advertised one or more of plaintiffs brand trademark companies and /or product lines online in unfair competition, to cause a mass false designation.

..... COUNT.VI

.CYBERSTALKING 2261 (2)(B)

1.The named defendants #1-69 77-108 used their computers/computer servers as a access devive and internet to harrass,intimidate, intentionally disrupt /deprive online profits to plaintiff and plaintiffs brand trade mark companies.The named defendants have 0 to do with plaintiff and will not leave plaintiff alone, or plaintiffs named brand trademark companies, going from brand to brand of plaintiffs causing monetary loss in damages and profits as other brands, and corrective advertising damages.The named defendants #1-69,#77-through #108 targeted plaintiff ,brands ,using their computer servers as a access device,to create plaintiffs product line and place cybersquatted domains, and infringed counterfeit goods of plaintiffs online to furthe disrupt plaintiffs brand companies from making a profit as other brand companies.

2. Conduct of one or more of the named defendants,including defendants #3,8,69 targeted,stalked plaintiff to plaintiffs albany new york residence and conspired with defendants #70,71,72,73,74, to get plaintiff harmed,out of apt ,(in which plaintiff was forced out of apt) out of new york, out of retaliation ,and in furtherance of a racketeering scheme to extort plaintiffs brand trade mark company and /or companies and product line conduct , in violation of extortion under the hobbs act 18USC1951.

..... COUNT.VII

FRAUD UNDER 1064 43a1125.

1.Named

defendants #28#66,#67,#68 participated in racketeering activity to extort plaintiffs brand trademark company/and or companies and product lines.Plaintiffs trademarks where obtained by multiple acts of fraud, and fraudulently,through cybersstalking,stalking,cybersquatting on plaintiffs brand trademark company and /or companies and knowingly and intentionally ,defendants,fraudulently registering the trademarks of plaintiffs with co-defendants,with out plaintiffs authority or knowledge.

.....COUNT.VIII

.....ANTICYBERSQUATTING UNDER THE 1996 ACT 43A1125 ,15USC125

1.The named defendants #20-24,#27,#28,#36,#39,#40,#65,#77 through-#96 intentionally and knowingly cybersquatted on plaintiffs brand trademark company /and or companies and product line registering the domains of as of/ similar/incorporating/and infringed on the brand trade marks and product line of plaintiffs

.....COUNT.VIII

..... DEPRIATION OF RIGHTS UNDER 241,242

1.The named defendants # 70 through #74 under color of law and in individual capacity

,conspired to violate plaintiffs civil right to equal protection allowing drug dealers to loiter in front of plaintiffs residence, in a racketeering scheme to get plaintiff harmed /and or killed by the drug dealers who appeared armed at plaintiffs residence daily. Plaintiffs ignored and refused to respond to the activity, and told the drug dealers that plaintiff,called. The named defendants under official and individual capacity coerced other police officers to make plaintiff move,in which the officers repeatedly told plaintiff to move, and coerced plaintiffs landlord to evict,in which he didleaving plaintiff homeless,in which plaintiff was retaliated against in seeking temporary/permanent housing assistance by new york state employees... The plaintiff found studio apt on online on craigslist in 2013 that defendants had 0 to do with, and acting under color of law and individual capacities conspired to force plaintiff out in,participating in racketeering activity related to extorting the brand trademarks of plaintiff.

2. The named defendants #1-108 intentionally deprived plaintiff , of equal treatment under the law/and or conspired to deprive plaintiff and plaintiffs brand trademark companies out of making online profit as other brand name companies in a scheme to defraud plaintiff

JURY.TRIAL.DEMANDED.

HEREFORE PLAINTIFF DEMANDS JUDGEMENT AGAINST ALL NAMED DEFENDANTS FOR INJUNCTIVE RELIEF AND DAMAGES TOTALING- \$34.960 BILLION DOLLARS (SEE RELIEF REQUESTED)

..SUMMARY.OF.DAMAGES

LOSS PROFITS .

JEANS INTERNATIONAL TM, INSIDE LIMOS CLOTHING, TM, CHUONG OO CHOOSE @ \$60 MILLION DOLLARS A YEAR SINCE 2015 , TOTALING \$2.440 BILLION DOLLARS IN LOSS PROFITS **2. CORRECTIVE ADVERTISING AT @1 MILLION DOLLARS A DAY AT 365 DAYS SINCE 2015-2019 TOTALING \$1.460 BILLION DOLLARS AND CONTINUED CORRECTIVE ADVERTISING FOR TWENTY YEARS TOTALING@ \$30.660 BILLION DOLLARS PER 3 BRAND COMPANIES**

3 PERMANENT RELOCATION COSTS AND SECURITY @ \$100MILLION DOLLARS

4. PRO SE COURT COSTS AND SECURITY @ \$100 MILLION DOLLARS

5. UNPAID ROYALTIES ESTIMATED @ \$200 MILLION DOLLARS

TOTALING \$

34.960 BILLION DOLLARS IN DAMAGES

DIVDED BY \$34.960 BILLION DOLLARS

2 DAMAGES PER PLAINTIFF, various among defendants, to be calculated.

E.DAMAGES / E.RT / E.RINT/RIT - Various among defendants, to be calculated.

.....RELIEF REQUESTED

1. Damages for \$34.960 BILLION DOLLARS IN DAMAGES .SEE SUMMARY OF DAMMAGES .DAMAGES CALCULATED PER DEFENDANT DIVIDED BY \$34.960 BILLION DOLLARS X3
- 2.Cease and Decease selling ,soliciting ,or placing other businesses advertisement ad space in their computer servers, or any computer server in the online search of any of plaintiffs company ,or companies product lines; GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM,HERE -DEAR INTERNATIONAL TM,FRANKIE SALLY INTERNATIONAL TM,CHUONG OO CHOOSE..
3. Remove the thousands to millions of others company ads, others .com businesses, or other content posted,not associated with any of plaintiffs named companies or companies product lines out of your computer servers in the online search for plaintiffs companies.
4. Remove the created search pages of plaintiffs named companies product lines out of your computer servers ,in search of plaintiffs product lines permantly. (Plaintiffs product lines can only be found on plaintiffs website or designated stores) (Plaintiff is marketing – advertising - promoting to get store accounts for large orders)
- 5.Cease and Decease manufacturing ,selling, imitating ,as of/similar/cloned/infridged products, product lines in interstate or foreign commerce of / as of /cloned /similar of /incorporating any of plaintiffs named companies or companies product lines.
- 6.Cease and Decease promoting,advertising,marketing any similar ,cloned ,infridging,as of incorporating product as of plaintiffs company or companies or companies product lines
7. Cease and Decease targeting, interfering, disrupting, with any online sells, collecting any income off plaintiffs company or companies ,interfering with online traffic ,online profits ,store sales ,interstate or foreign commerce of as of /similar /cloned /infridged /incorporating / of plaintiffs named companies or product lines.
- 8.Cease and Decease intentionally contacting ,interfering with any of plaintiffs product line manufacturers, or suppliers.
9. Cease and Decease intentionally monitering plaintiffs computer ,online searches ,to gain and use or – sale any information of trade secret designs ,trade secret creation of brand company names ,or other business related in commerce, or commerce for profit
10. Cease and Decease registering the domain names as of /similar / cloned /infridging /incorporating plaintiffs companies or or plaintiffs product lines. 11. Cancel the registered multiply domain names registered as of /similar /cloned /incorporating / of plaintiffs companies or companies product lines. 12. Cancelation of the multiple registered trademarks registered at the U.S.A. Commerce Department defendants knowingly and willfully knew of plaintiffs company brand trademarks formed earlier by plaintiff.
- 13.Cease and Decease taking public ,offering stock ,of any of as of /similar /cloned /incorporating any of plaintiffs companies or companies product lines. 14.Cease and Decease interfering with ,disrupting plaintiff taking company or companies public.
- 15.Cease and Decease buying any stock or investing in any of plaintiffs companies.
- 16.Cease and Decease contacting any of plaintiffs associates ,family , or friends,neighbors.
- 17.Cease and Decease moving to Albany New York ,relocating anywhere upstate past Albany NY, were plaintiff resides and business resides, or other temporary places plaintiff resides,frequent,is going to be. (Does not apply to defendants already living in Albany NY,area before 2013, and from upstate NY or past Albany NY or in Albany)
- 18.Cease and Decease , monitering ,interfering with ,intercepting ,disrupting, any of plaintiffs mail or email.
- 19.Cease and Decease interfering with plaintiffs internet connections ,business internet traffic,website online traffic,interrupting internet service.

20. Cease and Desist and remove posted yellow pages posted that plaintiffs online company sells muslim clothing, in which plaintiff does not, is not muslim or have any connection.

21. A permanent Stalking Injunction against all the named defendants.

22. A court appointed account for plaintiff to receive funds obtained from the defendants in transferring to plaintiffs bank account

23.A

court appointed court officer to monitor, receive payments owed to the court on behalf of plaintiff, and release payments to plaintiffs designated bank account.

24. For PRO SE fee's and cost, attorney's fee's and cost by each named defendant

25. For costs of suit herein incurred, that include travel expenses to and from court . by each named defendant.

26. For named defendants to pay unpaid royalties of \$ 15 million dollars each in their unauthorized licensing and usage of plaintiffs intellectual property.

27. Cancellation of the cybersquatted domains and \$ 100,000 of the each domain names. SEE DECLARATION DOMAINS LIST , SEE 43 (a) 1125 (d) , 15USC1125 PLUS -PRO SE fee's and cost in filing complaint in the amount of \$ 433,000 dollars by each domain registrant defendant paid to court appointed